

**BakerHostetler**



**By ECF**

September 8, 2023

The Honorable Jessica G.L. Clarke  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

*Re: United States Securities and Exchange Commission v. Qin, No. 20-cv-10849 (JGLC)*

Dear Judge Clarke:

Under the Joint Stipulation, which the Court so-ordered on August 8, 2023 (*see* ECF No. 237), we write this joint letter on behalf of Robert A. Musiala, Jr., the Court-appointed receiver in the above-referenced litigation (“Receiver”) and non-party respondents, Nasir Adaya (“Adaya”) and Phuong Nguyen (“Nguyen,” and together with Adaya, “Respondents”).

**I. Discovery Requests**

In accordance with the Joint Stipulation, the parties exchanged discovery requests on August 11, 2023. As of September 7, 2023, the parties have reached agreement on all disputes related to the document requests and have agreed to substantially complete production under those requests by Friday, September 15, 2023.

**II. Briefing Schedule**

In accordance with the Joint Stipulation, the parties met and conferred to discuss a briefing schedule, which is set forth below:

- October 27, 2023: Respondents will submit their Opposition to the Receiver’s Motion
- November 15, 2023: the Receiver will submit his Reply

**III. Joint Stipulation**

Attached hereto please find a Stipulation of the parties, which they jointly request the Court order. Receiver and Respondents agree that nothing in this letter or the accompanying Stipulation restricts their right to file a discovery motion in the future should either Receiver or Respondents deem it necessary to do so.

We thank your Honor for the consideration of this letter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Marco Molina'.

Marco Molina,  
for the Receiver

Two handwritten signatures in blue ink, one appearing to read 'Aviva J.B. Gilbert' and the other 'Gary M. Kaplan'.

Aviva J.B. Gilbert and Gary M. Kaplan,  
for the Respondents